



Colorado Water Quality Control Commission
Colorado Dept. of Public Health and Environment
4300 Cherry Creek Dr. South
Denver, CO 80246-1530

Sept. 21, 2015

Dear Commissioners:

The Animas River Stakeholders Group (ARSG) is planning on developing a proposal for the June 2017 Rulemaking regarding Regulation 34, Classifications and Numeric Standards for the San Juan and Dolores Rivers. ARSG is made up of a wide variety of interests including mining companies; environmental organizations; federal, state, and local governmental entities; and interested citizens. The group has been addressing metal loading from inactive and abandoned mine sites in the upper Animas River Basin for 21 years. (We define the upper Animas River Basin as the Animas Watershed upstream of Bakers Bridge.)

The last major changes made to standards in the upper Animas River Basin occurred in 2001 when WQCC adopted a wide ranging set of site specific standards based upon ARSG's Use Attainability Analysis (UAA). The foundation for those standards was what might be attainable if a number of mine remediation projects were undertaken. Over twenty-five TMDL's were developed by WQCD based the remediation scenario in the UAA.

In terms of water quality, the upper Animas River Basin is very complex. There are three major drainages and many more minor ones within a mineralized area. Sources of metal loading are both natural and mining-related. At least 200 mine sites have been initially characterized. There are nineteen WQCC stream and lake and reservoir segments in the upper Animas River Basin.

Since 2001, much more monitoring and characterizations has occurred in the Basin, and a number of remediation projects have been completed – almost 60 projects over the last 20 years. Therefore, ARSG's views the upcoming rulemaking as an opportune time to revisit standards in the upper Animas River Basin based upon what we have learned. We have conferred with the Division as to what segments, use classifications, and standards we may wish to address.

We plan to be in attendance at the Issues Scoping Hearing scheduled for October to answer any questions.

Sincerely,

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Co-Coordinator, ARSG

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